

EXHIBIT A

***Transcript of March 13, 2015 Deposition of
Detective Doris Lopez***

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 Docket No. 17-CV-06543 (RJS)

5 -----x
6 SEBASTIAN ARBELAEZ, et al.

7 Plaintiffs,

8 - against -

9 THE CITY OF NEW YORK, et al.,

10 Defendants.
11 -----x

12 (FULL CAPTION ON THE FOLLOWING PAGE)

13 99 Park Avenue

14 New York, New York

15 March 13, 2019

16 10:27 a.m.

17 * CONFIDENTIAL - ATTORNEYS' EYES ONLY *

18 VIDEOTAPED DEPOSITION of DORIS LOPEZ,
19 a Defendant in the above-entitled action,
20 held at the aforementioned time and place,
21 taken before Ashley Shugar, a Shorthand
22 Reporter and Notary Public of the State of
23 New York, pursuant to the Federal Rules of
24 Civil Procedure, Order and stipulations
25 between Counsel.

* * *

<p style="text-align: right;">Page 2</p> <p>1 2 (FULL CAPTION FROM THE PRIOR PAGE) 3 4 UNITED STATES DISTRICT COURT 5 SOUTHERN DISTRICT OF NEW YORK 6 Docket No. 17-CV-06543(RJS) 7 SEBASTIAN ARBELAEZ, LUZ ARBELAEZ, DEBORAH 8 ARBELAEZ, and PABLO ARBELAEZ, 9 10 Plaintiffs, 11 12 - against - 13 14 THE CITY OF NEW YORK, a municipal entity, 15 New York City Police Officers Detective 16 DORIS LOPEZ (Shield #487); Police Officer 17 RYAN BOYLAN; Detective MACK LIPINSKI; 18 Detective MARK O'CONNELL; Sergeant BRIAN 19 WINROW; Lieutenant EMILE PROVENCHER; 20 Confidential Informant RICHARD/RACHEL ROE; 21 and "JOHN and/or JANE DOES" Nos. 1, 2, 3, 22 etc. (whose identities are unknown but who 23 are known to be personnel of the New York 24 City Police Department), all of whom are 25 sued individually and in their official capacities, Defendants.</p>	<p style="text-align: right;">Page 4</p> <p>1 2 STIPULATIONS 3 4 IT IS HEREBY STIPULATED AND AGREED, 5 by and among counsel for the respective 6 parties hereto, that the filing, sealing 7 and certification of the within deposition 8 shall be and the same are hereby waived; 9 IT IS FURTHER STIPULATED AND AGREED 10 that all objections, except as to form of 11 the question, shall be reserved to the time 12 of the trial; 13 IT IS FURTHER STIPULATED AND AGREED 14 that the within deposition may be signed 15 before any Notary Public with the same 16 force and effect as if signed and sworn to 17 before the Court. 18 * * * 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 3</p> <p>1 2 A P P E A R A N C E S: 3 4 BELDOCK LEVINE & HOFFMAN LLP 5 Attorneys for Plaintiffs 6 99 Park Avenue, 26th Floor 7 New York, New York 10016 8 BY: MARC A. CANNAN, ESQ. 9 mcannan@blhny.com 10 FILE: 8240.01 11 12 13 NEW YORK CITY LAW DEPARTMENT 14 OFFICE OF THE CORPORATION COUNSEL 15 Attorneys for Defendants 16 100 Church Street 17 New York, New York 10007 18 BY: DANIEL SAAVEDRA, ESQ. 19 dsaaavedr@law.nyc.gov 20 DEBRA M. MARCH, ESQ. 21 22 23 A L S O P R E S E N T: 24 JONATHAN POPHAM, Videographer 25 * * *</p>	<p style="text-align: right;">Page 5</p> <p>1 D. LOPEZ - CONFIDENTIAL 2 THE VIDEOGRAPHER: Good 3 morning. 4 We are going on the record at 5 10:27 a.m. on March 13th, 2019. 6 Please note that the 7 microphones are sensitive and may 8 pick up whispering, private 9 conversations and cell- -- cellular 10 interference. 11 Please turn off all cell phones 12 or place them away from the 13 microphones as they can interfere 14 with the deposition audio. 15 Audio and video recording will 16 continue until all parties agree to 17 go off the record. 18 This is Media Number One of the 19 video deposition of Doris Lopez, 20 taken by counsel for Plaintiff, in 21 the matter of Sebastian Arbelaez, et 22 al. versus The City of New York, et 23 al. filed in the United States 24 District Court for the Southern 25 District of New York, Case Number</p>

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<p style="text-align: right;">Page 22</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 assignment after the 30th Precinct?</p> <p>3 A. Bronx narcotics.</p> <p>4 Q. Bronx narcotics.</p> <p>5 And when you say Bronx</p> <p>6 narcotics, did you have a particular</p> <p>7 assignment within Bronx narcotics?</p> <p>8 A. Yes, I was assigned the 48</p> <p>9 Module.</p> <p>10 Q. The 48?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And what is the 48</p> <p>13 Module?</p> <p>14 A. It's -- it's like the precinct,</p> <p>15 but it's only narcotics. The team is</p> <p>16 assigned to one specific location which</p> <p>17 will be the 48.</p> <p>18 Q. Okay. And do you --</p> <p>19 Are your offices in the 48th</p> <p>20 Precinct or do you have offices separately?</p> <p>21 A. Separately.</p> <p>22 Q. Okay. So you have a --</p> <p>23 Well, strike that.</p> <p>24 Okay. And when you went from</p> <p>25 being a conditions officer to a narcotics</p>	<p style="text-align: right;">Page 24</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 of training did you receive in regard to</p> <p>3 that?</p> <p>4 A. How to use the database, NYPD</p> <p>5 database --</p> <p>6 Q. Okay.</p> <p>7 A. -- to obtain information.</p> <p>8 Q. And I guess I should clarify,</p> <p>9 what is a kite?</p> <p>10 A. It's a complaint generated</p> <p>11 for nar- -- especially for narcotics.</p> <p>12 Q. Okay. And how are kites</p> <p>13 generated in narcotics? As in, do you have</p> <p>14 people who call in complaints or how would</p> <p>15 they be generated?</p> <p>16 A. All the above.</p> <p>17 Q. All the above? Okay.</p> <p>18 A. Yes.</p> <p>19 Q. So just give me some examples.</p> <p>20 A. 911 calls --</p> <p>21 Q. Okay.</p> <p>22 A. -- 311 calls --</p> <p>23 Q. Uh-huh.</p> <p>24 A. -- CI information --</p> <p>25 Q. Okay.</p>
<p style="text-align: right;">Page 23</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 officer, did you receive any special</p> <p>3 training to become a narcotics officer?</p> <p>4 A. Yes, sir.</p> <p>5 Q. And that would've been in 2011</p> <p>6 roughly?</p> <p>7 A. August 2011, yes.</p> <p>8 Q. Okay. And what kind of</p> <p>9 training did you receive before becoming a</p> <p>10 narcotics officer?</p> <p>11 A. How to identify drugs, how to</p> <p>12 execute a search warrant, how to</p> <p>13 investigate kites at that moment.</p> <p>14 Q. Okay. And generally, the</p> <p>15 training for how to execute a search</p> <p>16 warrant, what do you recall that consisting</p> <p>17 of?</p> <p>18 A. There was a cycle that will</p> <p>19 show you how to break doors literally --</p> <p>20 Q. Okay.</p> <p>21 A. -- get into the apartment to</p> <p>22 execute a search warrant. That's how.</p> <p>23 Q. That sounds like fun training.</p> <p>24 And what about the training for</p> <p>25 investigating kites? Generally, what kind</p>	<p style="text-align: right;">Page 25</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 A. -- anonymous calls.</p> <p>3 Q. Okay. Today I'm gonna be</p> <p>4 showing you several documents having to do</p> <p>5 with the May 29th, 2015, raid or the</p> <p>6 investigation leading up to it.</p> <p>7 But I'd like to get your</p> <p>8 general recollection of that event first.</p> <p>9 So if you could just give me a general</p> <p>10 narrative of what you recall about, you</p> <p>11 know, what started -- caused you to start</p> <p>12 investigating 240 -- 2416 Webster Avenue,</p> <p>13 you know, going through the raid.</p> <p>14 MR. SAAVEDRA: Objection to</p> <p>15 form.</p> <p>16 You can answer.</p> <p>17 THE WITNESS: CI information</p> <p>18 that stated Apartment 1 Sam on 2416</p> <p>19 was selling drugs. Conduct the</p> <p>20 investigation; a database, NYPD</p> <p>21 checks; develop two control buys with</p> <p>22 the CI. A judge in the Bronx gave us</p> <p>23 a search warrant. We executed the</p> <p>24 search warrant with positive results.</p> <p>25</p>

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<p style="text-align: right;">Page 154</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 to those individuals in that apartment.</p> <p>3 Q. Well, is it --</p> <p>4 Did the narcotic sale -- sales</p> <p>5 occur in the apartment or was it just the</p> <p>6 individual was arrested for narcotics</p> <p>7 somewhere?</p> <p>8 MR. SAAVEDRA: Objection to</p> <p>9 form.</p> <p>10 You can answer.</p> <p>11 THE WITNESS: The Triple I</p> <p>12 state the arrests of what the charges</p> <p>13 were made on the individual.</p> <p>14 BY MR. CANNAN:</p> <p>15 Q. Uh-huh.</p> <p>16 A. If it was for the possession or</p> <p>17 sale, I wouldn't know the details where it</p> <p>18 was sell or where it was.</p> <p>19 When I run the Triple I based</p> <p>20 on that location, it's -- there was a</p> <p>21 history of narcotics for that apartment.</p> <p>22 Those individuals were in a history of</p> <p>23 narcotics.</p> <p>24 I don't know if I'm making</p> <p>25 myself clear.</p>	<p style="text-align: right;">Page 156</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 happened inside the apartment or at</p> <p>3 the door of the apartment, yes.</p> <p>4 BY MR. CANNAN:</p> <p>5 Q. Okay. And did you say you</p> <p>6 would have requested the 61?</p> <p>7 MR. SAAVEDRA: Objection to</p> <p>8 form.</p> <p>9 You can answer.</p> <p>10 THE WITNESS: I said I would</p> <p>11 view the 61.</p> <p>12 BY MR. CANNAN:</p> <p>13 Q. Oh, you would've viewed the 61?</p> <p>14 Okay.</p> <p>15 A. 'Cause as my DD-5 stated here,</p> <p>16 it says "victim of a shooting."</p> <p>17 Q. Uh-huh.</p> <p>18 A. My recollection -- well, that</p> <p>19 reading that state- -- you know, will</p> <p>20 remind me that I had viewed the 61 and</p> <p>21 that's why I know he was a victim of a</p> <p>22 shooting.</p> <p>23 Q. Uh-huh.</p> <p>24 A. Otherwise, I would've noted it</p> <p>25 as the perpetrator of a shooting.</p>
<p style="text-align: right;">Page 155</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 Q. The individuals or the</p> <p>3 apartment, that's what I'm trying to figure</p> <p>4 out?</p> <p>5 A. Both.</p> <p>6 Q. Both?</p> <p>7 A. Yes.</p> <p>8 Q. Okay.</p> <p>9 A. 'Cause if -- on the control</p> <p>10 buys to that location, they're selling</p> <p>11 narcotics. And, now, the individuals in --</p> <p>12 living in that location have a narcotic</p> <p>13 history.</p> <p>14 Q. And you're saying the -- the</p> <p>15 narcotic history of selling drugs out of</p> <p>16 that apartment?</p> <p>17 A. Correct, sir.</p> <p>18 Q. Okay. Now, if this shooting</p> <p>19 had occurred just days before you started</p> <p>20 your investigation, that would be relevant,</p> <p>21 correct?</p> <p>22 MR. SAAVEDRA: Objection to</p> <p>23 form.</p> <p>24 You can answer.</p> <p>25 THE WITNESS: If the shooting</p>	<p style="text-align: right;">Page 157</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 Q. Right. Okay.</p> <p>3 And do you recall doing any</p> <p>4 other investigation of that shooting?</p> <p>5 A. No, sir.</p> <p>6 Q. Wouldn't you have wanted to</p> <p>7 talk to the police officers investigating</p> <p>8 the shooting?</p> <p>9 MR. SAAVEDRA: Objection to</p> <p>10 form.</p> <p>11 You can answer.</p> <p>12 THE WITNESS: It depends on the</p> <p>13 situation.</p> <p>14 BY MR. CANNAN:</p> <p>15 Q. Okay. Well --</p> <p>16 A. Like I said and I mentioned it,</p> <p>17 if the shooting happened and it's on my --</p> <p>18 the apartment that I'm investigating, yes.</p> <p>19 Q. Okay.</p> <p>20 A. But if the shooting didn't</p> <p>21 happen inside the building at all, no.</p> <p>22 Q. Okay. So right at the time</p> <p>23 your CI allegedly tells you there's drug</p> <p>24 sales going on in this apartment, there's a</p> <p>25 shooting in front of the apartment in which</p>

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<p style="text-align: right;">Page 158</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 one of the occupants of the apartment is</p> <p>3 hit by a bullet.</p> <p>4 Would you be interested in</p> <p>5 investigating that further?</p> <p>6 MR. SAAVEDRA: Objection to</p> <p>7 form.</p> <p>8 You can answer.</p> <p>9 THE WITNESS: Yes and no.</p> <p>10 As my knowledge, I was assigned</p> <p>11 to the 48, pretty much know the</p> <p>12 narcotics history within the</p> <p>13 location. That street was full,</p> <p>14 always, of narcotic. You have a park</p> <p>15 also next door. So it wasn't --</p> <p>16 It depends on the situation,</p> <p>17 again.</p> <p>18 If it would've happened inside</p> <p>19 the apartment, yes, I would have</p> <p>20 probably proceed more of going and</p> <p>21 investigating it.</p> <p>22 BY MR. CANNAN:</p> <p>23 Q. But even though it's an</p> <p>24 occupant of the -- occupant of the</p> <p>25 apartment being shot right in front of the</p>	<p style="text-align: right;">Page 160</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 MR. SAAVEDRA: Objection to</p> <p>3 form.</p> <p>4 You can answer.</p> <p>5 THE WITNESS: I don't remember</p> <p>6 if I did or not did -- or didn't do</p> <p>7 it.</p> <p>8 BY MR. CANNAN:</p> <p>9 Q. Is that something the field</p> <p>10 intelligence officer would've told you when</p> <p>11 you were asking about this address, that</p> <p>12 shooting?</p> <p>13 A. I don't remember when the</p> <p>14 shooting happened.</p> <p>15 Q. Well, I'll tell you it happened</p> <p>16 on May 16th, right before you started this</p> <p>17 investigation.</p> <p>18 And your DD-5, I forget if it</p> <p>19 was May 19th or May 20th.</p> <p>20 So that's just days, correct?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Yeah.</p> <p>23 But you have no recollection of</p> <p>24 whether anybody told you -- an- -- what the</p> <p>25 field intelligence officer told you</p>
<p style="text-align: right;">Page 159</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 apartment?</p> <p>3 MR. SAAVEDRA: Objection.</p> <p>4 You can answer.</p> <p>5 THE WITNESS: Well, there's so</p> <p>6 many --</p> <p>7 When Accurant shows you that</p> <p>8 this person might become living in</p> <p>9 this apartment, might be living,</p> <p>10 might not be living. It's just</p> <p>11 mentioning that the person lives</p> <p>12 there.</p> <p>13 BY MR. CANNAN:</p> <p>14 Q. Uh-huh.</p> <p>15 A. I know --</p> <p>16 Q. So that's something you might</p> <p>17 want to investigate, right?</p> <p>18 A. Correct.</p> <p>19 MR. SAAVEDRA: Objection to</p> <p>20 form.</p> <p>21 You can answer.</p> <p>22 THE WITNESS: Yes.</p> <p>23 BY MR. CANNAN:</p> <p>24 Q. Maybe talk to the detectives</p> <p>25 who were doing that investigation?</p>	<p style="text-align: right;">Page 161</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 anything, correct?</p> <p>3 A. No, sir.</p> <p>4 Q. You said you have a lot of</p> <p>5 experience with the drug activity going on</p> <p>6 in that block?</p> <p>7 A. The whole 48.</p> <p>8 Q. I'm sorry?</p> <p>9 A. The whole 48.</p> <p>10 Q. The whole --</p> <p>11 A. I was --</p> <p>12 Q. -- 48?</p> <p>13 A. -- assigned to the 48 Module.</p> <p>14 Q. But even --</p> <p>15 Wasn't that block --</p> <p>16 Didn't -- didn't Webster Avenue</p> <p>17 particularly have a lot of drug activity?</p> <p>18 A. Webster, Hughes, Crotona</p> <p>19 Avenue --</p> <p>20 Q. And that --</p> <p>21 A. Crotona --</p> <p>22 Q. Crotona.</p> <p>23 A. -- Park.</p> <p>24 Q. Right.</p> <p>25 A. Everywhere.</p>

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1 D. LOPEZ - CONFIDENTIAL
 2 And you told me before you
 3 never heard of YNR, correct?
 4 A. Correct.
 5 Q. So you never heard about
 6 Kenneth Rudge being arrested?
 7 MR. SAAVEDRA: Objection.
 8 You can answer.
 9 THE WITNESS: Heard?
 10 BY MR. CANNAN:
 11 Q. Heard about --
 12 Did you ever learn Kenneth
 13 Rudge was arrested as a member of YNR?
 14 A. After the takedown, yes.
 15 Q. After the takedown?
 16 A. Uh-huh.
 17 Q. So you are aware --
 18 You have heard about YNR then?
 19 A. But after the takedown. Not
 20 when I --
 21 Q. Okay.
 22 A. -- was conducting my
 23 investigation.
 24 Q. And not when you were part of
 25 the 48th Module?

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1 D. LOPEZ - CONFIDENTIAL
 2 A. No.
 3 Q. Are you aware that YNR had been
 4 operating in the vicinity of 180th Street
 5 and Webster Avenue since 2- -- 2012?
 6 A. I don't remember I was aware.
 7 Q. So you might've been aware?
 8 A. Might.
 9 Q. That they were engaged in a
 10 conspiracy to distribute crack cocaine and
 11 heroin to addicts in that area?
 12 MR. SAAVEDRA: Objection.
 13 You can answer.
 14 THE WITNESS: I don't remember,
 15 sir.
 16 BY MR. CANNAN:
 17 Q. And that despite their modest
 18 size, they managed to bring large
 19 quantities of crack cocaine and heroin into
 20 its neighborhood?
 21 MR. SAAVEDRA: Objection.
 22 BY MR. CANNAN:
 23 Q. And to inflict and pointless
 24 and ultimately deadly violence on this
 25 community?

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1 D. LOPEZ - CONFIDENTIAL
 2 MR. SAAVEDRA: Objection.
 3 You can answer.
 4 THE WITNESS: As being in the
 5 48, that's every block.
 6 BY MR. CANNAN:
 7 Q. And you --
 8 But you weren't aware of this
 9 gang operating on that block?
 10 A. The block, no. At that moment
 11 of my investigation, no.
 12 Q. At all during your time at the
 13 48th?
 14 A. After, yes.
 15 Q. When after?
 16 A. After I did my search warrant.
 17 Q. So between the end of May 2015
 18 and the next year you learned that?
 19 A. Yes.
 20 Q. And did you ever learn about
 21 Rashod Lewis being arrested as a member of
 22 YNR?
 23 A. I don't remember the name.
 24 Q. Showing you Plaintiffs' 11,
 25 he's the individual on the right-hand side.

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1 D. LOPEZ - CONFIDENTIAL
 2 A. The one with the cigarette?
 3 Q. The one who has kind of a smirk
 4 on his face.
 5 THE VIDEOGRAPHER: You're
 6 blocking the --
 7 MR. CANNAN: Sorry.
 8 THE WITNESS: Here
 9 (indicating)?
 10 BY MR. CANNAN:
 11 Q. On your left. Sorry.
 12 A. Yeah, my left.
 13 Q. Okay.
 14 A. If you mean smirking --
 15 Q. Yeah.
 16 A. -- over here?
 17 Q. Yeah.
 18 A. I don't remember I seen his
 19 picture prior of my investigation --
 20 Q. Uh-huh.
 21 A. -- but later on, yes.
 22 Q. Okay. And are you aware he's
 23 now is serving 30 years in prison for
 24 selling drugs and committing violence --
 25 MR. SAAVEDRA: Objection.

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<p style="text-align: right;">Page 370</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 BY MR. CANNAN:</p> <p>3 Q. -- in the neighborhood of 180th</p> <p>4 and Webster?</p> <p>5 MR. SAAVEDRA: Objection.</p> <p>6 You can answer.</p> <p>7 THE WITNESS: I don't know how</p> <p>8 long he's been serving.</p> <p>9 BY MR. CANNAN:</p> <p>10 Q. Well --</p> <p>11 Okay.</p> <p>12 And the person in the middle</p> <p>13 there, Kenneth Rudge, are you aware that</p> <p>14 he's serving approximately 30 years for</p> <p>15 violence and drug-related crimes?</p> <p>16 MR. SAAVEDRA: Objection.</p> <p>17 You can answer.</p> <p>18 THE WITNESS: It was a big</p> <p>19 takedown. But I don't remember</p> <p>20 who -- who specifically was arrested.</p> <p>21 BY MR. CANNAN:</p> <p>22 Q. Uh-huh.</p> <p>23 A. And -- or how long they've been</p> <p>24 serving right now.</p> <p>25 Q. And did you learn that it</p>	<p style="text-align: right;">Page 372</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 BY MR. CANNAN:</p> <p>3 Q. Uh-huh.</p> <p>4 Your CI never told you about</p> <p>5 this drug gang?</p> <p>6 MR. SAAVEDRA: Objection.</p> <p>7 You can answer.</p> <p>8 THE WITNESS: The CI would</p> <p>9 mention that there was violence, but</p> <p>10 I will note it on my DD-5 even if he</p> <p>11 will men= -- he or she would mention</p> <p>12 it.</p> <p>13 BY MR. CANNAN:</p> <p>14 Q. Uh-huh. Okay.</p> <p>15 I'll take these back.</p> <p>16 Did you learn as part of your</p> <p>17 investigation that Sebastian Arbelaez had</p> <p>18 filed a CCR complete -- complaint against</p> <p>19 the police in the couple of weeks prior to</p> <p>20 the start of your investigation?</p> <p>21 A. No, sir.</p> <p>22 Q. You didn't learn that he</p> <p>23 complained police were using unnecess- --</p> <p>24 excessive force on a person they had taken</p> <p>25 into custody in front of their building?</p>
<p style="text-align: right;">Page 371</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 was a --</p> <p>3 The second floor on 2416</p> <p>4 Webster Avenue was a -- a stash house for</p> <p>5 YNR?</p> <p>6 MR. SAAVEDRA: Objection.</p> <p>7 You can answer.</p> <p>8 THE WITNESS: While my</p> <p>9 investigation was conducting?</p> <p>10 BY MR. CANNAN:</p> <p>11 Q. At any time.</p> <p>12 A. Later, yes.</p> <p>13 Q. Okay. But --</p> <p>14 A. Later on.</p> <p>15 Q. -- you didn't learn during your</p> <p>16 investigation?</p> <p>17 A. Correct.</p> <p>18 Q. And did you learn that Carlos</p> <p>19 Titan (phonetic) was also convicted as a --</p> <p>20 for selling drugs and committing violence</p> <p>21 as a YNR member?</p> <p>22 MR. SAAVEDRA: Objection.</p> <p>23 You can answer.</p> <p>24 THE WITNESS: Later on, when</p> <p>25 the takedown happened, yes.</p>	<p style="text-align: right;">Page 373</p> <p>1 D. LOPEZ - CONFIDENTIAL</p> <p>2 MR. SAAVEDRA: Objection.</p> <p>3 You can answer.</p> <p>4 THE WITNESS: No, sir, I</p> <p>5 didn't. Didn't know.</p> <p>6 BY MR. CANNAN:</p> <p>7 Q. Did any of your searches show</p> <p>8 you when people in that building at 2416</p> <p>9 Webster Avenue called the police?</p> <p>10 A. 911 calls.</p> <p>11 Q. 911 calls?</p> <p>12 A. Yes.</p> <p>13 Q. Okay.</p> <p>14 MR. CANNAN: Do you want to</p> <p>15 take a short break, kind of stretch</p> <p>16 your legs? Yeah.</p> <p>17 THE VIDEOGRAPHER: Okay. We're</p> <p>18 going off the record at 6:18 p.m.</p> <p>19 This marks the end of Media</p> <p>20 Four.</p> <p>21 (A brief recess was taken from</p> <p>22 6:18 p.m. to 6:24 p.m.)</p> <p>23 THE VIDEOGRAPHER: We're back</p> <p>24 on the record at 6:24 p.m.</p> <p>25 This marks the beginning of</p>

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